

## REMARKS/ARGUMENTS

The amendment is in response to the Office Action dated May 13, 2004. Claims 1-33 are pending in the present application.

### Objection to the Title

The Examiner objected to the Title as being non descriptive of the invention to which the claims are directed. Applicant has amended the Title to be "Role-Based Access to Image Metadata." Applicant respectfully submits that the Title, as amended, is clearly indicative of the invention.

### Claim Rejections

The Examiner rejected claims 1-33 under 35 U.S.C. §103(a) as being unpatentable over Sheridan (U.S. Patent No. 5,760,917) in view of Haverstock et al. (U.S. Patent No. 6,434,607). Applicant respectfully disagrees.

The present invention provides an improved method for allowing users to access metadata associated with a digital image. The process begins by defining metadata elements for an image file. Particular roles (e.g., job roles) are then associated with the individual metadata elements defined for the image. All users who will access the image are assigned particular roles. After the metadata elements in the image file has been populated with data and stored on a server or other device, users may make requests from the server to access the image and its metadata. The user's role is then compared to the roles associated with the metadata elements in the image to determine what metadata elements to make available to the user.

According to the present invention, different users of the metadata with different interests in the data will automatically be provided access to only the metadata that they need based on their assigned roles.

Claims 1, 9 and 17

Applicant respectfully submits that none of the cited references teach or suggest the cooperation of elements recited in independent claims 1, 9 and 17. In particular, Sheridan in view of Haverstock fail to teach or suggest “associating the roles with individual *metadata* elements,” “receiving a request for access to the *metadata* by a particular user, wherein the user’s role is determined from the request,” and “comparing . . . to determine which *metadata* elements to make available to the user,” as recited in claims 1, 9 and 17.

In contrast to the present invention, Sheridan is directed to controlling access to an image set, e.g., a photo album, by third party viewers. (Abstract). The user grants access rights to individual third party viewers, which are then stored at a hub station with the image set. The third party viewer is then invited to access the image set according to the corresponding access rights. (Col. 4, line 48 to col. 5, line 64). Haverstock is directed to a system for enabling access to non-HTML files from a web browser. The system includes a security module that assigns a priority level to a user. The priority level or role is used to grant or deny access to the documents or fields within the documents. (Abstract). Together, Sheridan in view of Haverstock teach controlling access to a set of images by associating access rights with roles and assigning a role to each third party viewer. Thus, the third party viewer’s access rights to an image set are defined by the party’s assigned role.

Applicant respectfully submits that both Sheridan and Haverstock are directed to controlling access to image sets and files, respectively. Neither reference is concerned with *metadata*, which is commonly defined as “data that describes other data” or “data about data” (See TechEncyclopedia at <http://www.techweb.com/encyclopedia>), associated with an image set or with a file. In the present invention, for example, metadata or information associated with a

captured image can include the data and time of capture, the name of the image, image size, the camera settings, copyright information, comments about the image, and other data regarding the image. (Specification, page 1, line 11 to page 2, line 16). Accordingly, Applicant respectfully submits that neither Sheridan nor Haverstock mentions or suggests “controlling access to image *metadata*,” “associating the roles with *individual* metadata elements,” “receiving a request for access to the *metadata* by a particular user,” and “comparing the user’s role to the roles associated with the metadata elements to determine which metadata elements to make available to the user,” as recited in claims 1, 9 and 17.

For the reasons presented above, Applicant respectfully submits that because the cited references fail to teach or suggest the cooperation of elements recited in claims 1, 9, and 17, those claims are allowable over the cited references. Claims 2-8, 10-16 and 18-24 depend from claims 1, 9 and 17, respectively, and are therefore also allowable over the cited references.

#### Claim 25

Applicant respectfully submits that Sheridan in view of Haverstock fails to teach or suggest the cooperation of elements recited in claim 25. In particular, the cited references fail to teach or suggest “controlling access to image metadata,” “associating particular roles with individual metadata elements,” “assigning each role certain access privileges for the metadata element,” “receiving a request to access the image and its metadata,” and “comparing the role assigned to the user with the roles associated with the metadata elements in the image file to determine what metadata elements to make available to the user for reading, writing or modifying,” as recite in claim 25. Applicant incorporates by reference the arguments presented above with respect to claims 1, 9 and 17.

Because the cited references fail to teach or suggest the cooperation of elements recited in claim 25, that claim is allowable over the cited references. Claims 26-29 depend from claim 25, and are therefore also allowable over the cited references.

Claim 30

Applicant respectfully submits that Sheridan in view of Haverstock fails to teach or suggest the cooperation of elements recited in claim 30. In particular, the cited references fail to teach or suggest “controlling access to image metadata,” “associating the IDs with individual metadata elements,” “receiving a request for access to the metadata by a particular user,” and “comparing the user’s ID to the IDs associated with the metadata elements to determine which metadata elements to make available to the user,” as recite in claim 30. Applicant incorporates by reference the arguments presented above with respect to claims 1, 9 and 17.

Because the cited references fail to teach or suggest the cooperation of elements recited in claim 30, that claim is allowable over the cited references. Claims 31 and 32 depend from claim 30, and are therefore also allowable over the cited references.

Claim 33

Finally, Applicant respectfully submits that Sheridan in view of Haverstock fails to teach or suggest the cooperation of elements recited in claim 33. In particular, the cited references fail to teach or suggest a server for “controlling access to image file metadata,” “a list of roles and access privileges associated with each of the metadata elements,” and “means for comparing the role assigned to the user with the roles associated with the metadata elements in the image file to determine what metadata elements to make available to the user,” as recited in claim 33. Accordingly, claim 33 is allowable over the cited references.

Conclusion

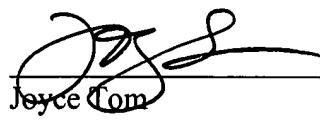
In view of the foregoing, Applicant respectfully submits that claims 1-33 are allowable over the cited references. Applicant respectfully requests reconsideration and allowance of the claims as now presented.

Applicant's attorney believes that this application is in condition for allowance. Should any unresolved issues remain, Examiner is invited to call Applicant's attorney at the telephone number indicated below.

Respectfully submitted,  
SAWYER LAW GROUP LLP

August 5, 2004

Date



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